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September 13, 1994

VIA FEDERAL EXPRESS

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Federal Communications Commission
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Re: Billed Party Preference for O+ InterLATA Calls
CC Docket No. 92-77

Dear Mr. Caton:

Please find enclosed for filing the original and eleven (11) copies of **REPLY COMMENTS OF CALIFORNIA PAYPHONE ASSOCIATION** in the above-referenced proceeding.

Please return a file-stamped copy in the enclosed self-addressed envelop provided for your convenience.

Thank you in advance for your kind attention to this matter.

Very truly yours,

GRAHAM & JAMES

By


Suzanne E. Curtis

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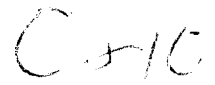
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In the Matter of)
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for 0+ InterLATA Calls)

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SUMMARY

In the Further Notice of Proposed Rulemaking, the Federal Communications Commission identified reduced operator services provider ("OSP") rates and increased competition as major goals of billed party preference ("BPP"). California Payphone Association ("CPA") believes, and will seek to show through these reply comments, that a reasonable system of price cap regulation would provide a far less costly and more practical means of achieving both these goals. CPA offers California's experience as evidence that rate caps can work simply and effectively to curb abusive pricing.

CPA believes that BPP would impair competition in the provision of operator services by emphasizing big-budget image creation over the provision of efficient services at the operational level. BPP would favor the handful of carriers whose names are household words, fostering an oligopoly of those few OSPs that can afford massive budgets for nationwide advertising.

A reasonable system of price cap regulation can provide an appropriate balance between the needs of consumers and those of the OSP and payphone industries, providing a means to prevent exorbitant charges without eliminating those small and mid-sized OSPs that are seeking to compete fairly. The Commission should adopt a rate cap approach as an alternative to BPP.

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REPLY COMMENTS OF
CALIFORNIA PAYPHONE ASSOCIATION

California Payphone Association ("CPA") hereby submits its reply comments in the above-captioned proceeding, in accordance with the procedural schedule established by the Federal Communications Commission ("Commission") in the Further Notice of Proposed Rulemaking ("Further Notice") released June 6, 1994, as amended by Orders DA-703 adopted June 24, 1994, and DA 94-901 adopted August 17, 1994. The primary purpose of these reply comments is to contribute CPA's views, based on experience in the California market, with respect to the relative merits and costs of a system of billed party preference ("BPP") as compared with a system of price cap regulation as a means of addressing the problem of abusive charging for payphone-based calling by some operator service providers ("OSPs").

II. INTRODUCTION

Although CPA did not file opening comments in this proceeding, its review of various parties' comments has persuaded CPA that the discussion to date of price cap regulation as an alternative to BPP may seriously mislead the Commission. CPA believes that it may be helpful to the Commission, in its consideration of BPP, for CPA to describe the experience of California with a regime of price cap regulation of operator services that has been both practical and effective in curbing abusive pricing while not interfering unduly with the marketplace choices of OSPs, payphone providers, or end users.

In the Further Notice, the Commission identified reduced OSP rates and increased competition as major goals of BPP. Further Notice, at 2-3. CPA believes, and will seek to show, that a reasonable system of price cap regulation would provide a far less costly and more practical means of achieving both these goals.

Contrary to those supporters of BPP who consider rate caps either unenforceable or burdensome, CPA respectfully offers the experience of independent payphone providers ("IPPs") in California operating under a regulatory program that has already proven successful in curtailing excessive OSP pricing while not imposing severe burdens either on legitimate OSPs or on the regulatory agency itself.

Several parties have taken the position that BPP will harm competition. See, e.g., Teltrust, Inc. ("Teltrust") Comments, at 6-10; Teleport Communications Group ("TCG") Comments, at 8-11; American Public Communications Council ("APCC") Comments, at 12-15. CPA shares this concern, believing that BPP will impair competition in the provision of operator services by emphasizing big-budget image creation over the provision of efficient services at the operational level. BPP will favor the handful of carriers whose names are household words, fostering an oligopoly of those few OSPs that can afford massive budgets for nationwide advertising.

A reasonable system of price cap regulation can provide an appropriate balance between the needs of consumers and those

of the OSP and payphone industries, providing a means to prevent exorbitant charges without eliminating those small and mid-sized OSPs that are seeking to compete fairly. California's experience is evidence that rate caps can work simply and effectively to curb abusive pricing. The Commission should adopt a rate cap approach as an alternative to BPP.

II. DISCUSSION

A. There Is General Agreement That OSP Overcharging From Payphones Is a Persistent Problem That Requires Attention at the National Level.

The opening comments of nearly all the parties (whether favoring or opposing BPP) acknowledge that the present system of IEC presubscription for public phones has negatively affected consumer confidence in the telecommunications industry and that this problem requires some regulatory response at the national level. See, e.g., Pacific Bell and Nevada Bell ("Pacific") Comments, at 8; APCC Comments, at 30; MCI Communications Corp. ("MCI") Comments, at 2. CPA, whose members include more than 230 independent payphone providers in the State of California, agrees with this assessment, but respectfully urges the Commission to conclude that a reasonable system of price cap regulation would provide a more efficient and direct (and therefore preferable) means of reducing OSP rates than any of the very costly proposals for implementing BPP. CPA further submits that, contrary to the comments of MCI and Sprint, interexchange carriers ("IECs") which stand to receive the greatest financial benefit from BPP, rate

regulation will be less harmful to overall competition than the adoption of BPP.

B. Many Parties, Including Supporters of BPP, Have Recognized That Rate Caps Offer a Viable and Less Costly Alternative for Curbing OSP Overcharging.

Many parties have expressed support for rate caps as the preferred method for rectifying the problems BPP has been intended to address. See, e.g., Teltrust Comments, at 13-16; TCG Comments, at 2; United States Long Distance, Inc. ("USLD") Comments, at 15-17; APCC Comments, at 30-32; Pennsylvania Public Utilities Commission ("PaPUC") Reply Comments, at 10-11. Aside from certain IECs, which look forward to the greatest financial benefit from BPP, and some local exchange carriers ("LECs"), whose support of BPP is conditioned upon assurances of guaranteed cost recovery (see, e.g., Pacific Comments, at 9), most parties remain unconvinced that the radical step of implementing BPP would be worth the costs. Not only do OSPs and IPPs support the imposition of rate caps, but several state public utilities commissions also see the merits of rate caps for controlling overcharging by OSPs. See, e.g., PaPUC Reply Comments, at 10-11. Even Pacific, while supporting BPP, recognizes that rate caps would adequately address some of the major problems that BPP is intended to resolve. Pacific Comments, at 8-9.

Not surprisingly, Teltrust and USLD, both OSPs, and APCC, a national association representing independent payphone providers, oppose BPP. It is significant, however, that these

parties are willing to address the problem of OSP overcharging directly, through a fair system of rate regulation.

USLD describes the measures taken by many states to rein in those OSPs that have charged excessive or unreasonably high rates. USLD Comments, at 16. USLD notes that:

Thirty-four states currently impose some form of rate restriction upon the provision of intrastate operator services. These measures have involved rulemakings in which operator service providers and consumer advocacy groups have presented testimony regarding costs structures and consumer thresholds.

Id. Teltrust similarly embraces the establishment of "a fair rate ceiling and an enforcement mechanism with teeth." Teltrust Comments, at 14.

Like Teltrust and USLD, APCC would prefer to have the Commission address its concerns about excessive OSP rates directly, rather than through the complex structure of BPP. According to APCC:

At bottom, the issue that underlies this proceeding is consumer concern about operator service rates. . . . Therefore, it is appropriate to address the issue of operator service rates directly, rather than resorting to the costly and highly intrusive apparatus of BPP. The Commission should set reasonable "benchmarks" for operator service rates . . .

APCC Comments, at 30.

Although the LECs are not unanimous either in supporting or opposing BPP, most LECs acknowledge that there are viable alternatives to solve many, if not all, the problems meant to be resolved by BPP. For instance, the smaller LECs oppose BPP and urge the Commission to "concentrate on the real culprits creating this problem: the IXC operator service providers that

charge excessive rates and the premise owners of public phones that prey upon captive customer callers." National Telephone Cooperative Association ("NTCA") Comments, at 6-7. NTCA believes that the consumer would receive benefits equivalent to those promised under BPP through educational efforts, and at a fraction of the cost of implementing BPP. Id. at 7.

Nor can the larger LECs ignore the logic of looking to a rate cap approach. Pacific, for example, states:

One alternative to a billed party preference system, therefore, is to prevent rate gouging, so that consumers will be able to use operator-assisted calling without fear. Putting some sort of rate cap on OSPs, while instituting an 0+ pub[li]c domain-type system, may solve some of the problems BPP is attempting to rectify.

Pacific Comments, at 9 (emphasis added).

C. The Reasons That Have Been Given for Rejecting a Price Cap Alternative Do Not Survive Scrutiny.

The National Association of Consumer Advocates ("NASUCA") admits that rate regulation is theoretically possible as a remedy for OSP overcharging, but then rejects this alternative in part on the basis that reasonable rate regulation is unenforceable and in part because it believes that determining a pricing policy is too difficult. NASUCA Comments, at 4-5. These are the primary contentions that have been offered in opposition to a price cap alternative to BPP. They do not hold up under scrutiny.

NASUCA offers no relevant factual support for either of these contentions, but rather only a series of conjectures based

on vague references to unnamed "[s]tates with experience in attempting to regulate prices of OSPs." Id. at 4. The experience with price cap regulation of OSPs in California, with which CPA is well acquainted, suggests a contrary set of conclusions.

In their opening comments, both APCC and Teltrust point to California's experience as an example of a successfully enforced rate regulation program. APCC Comments, at 31; Teltrust Comments, at 15. CPA can confirm the validity of this example.

The California program, referred to as the Customer Owned Pay Telephone ("COPT") Enforcement Program, evolved from a 1990 decision by the California Public Utilities Commission ("CPUC") approving, with exceptions not relevant here, an industry-wide settlement of a broad investigation of issues relating to COPT services. That decision retained and made more stringent a pre-existing system of price caps applicable to sent-paid and non-sent-paid calling from COPT stations, while establishing a new set of procedures to enforce the price cap regime. CPUC Decision 90-06-018, Appendix A, at 22-26, 43-45, 72-73. The details of those procedures were set for further elaboration through a workshop process. CPUC Decision 90-06-018, at 20-21, 31, 36 CPUC 2d 446, 456, 461 (1990). The participants, including CPUC staff, LEC and COPT industry representatives, and consumer advocacy groups, were instructed to prepare a report on the results of the workshop. Id. at 31 (Ordering Paragraph 2), 36 CPUC 2d, at 461.

After three years' work and experience, the CPUC's Commission Advisory & Compliance Division staff completed and released the Workshop Report on COPT Service, dated December 21, 1993 ("Workshop Report"). As the report described, the workshop developed a self-enforcement program whereby COPT providers voluntarily opted to take an active role in improving the quality of services offered to the public and enforcing various consumer safeguards, including the system of CPUC-mandated rate caps. The result, at least in the area of rate cap enforcement, was a clearly demonstrated success.

Contrary to NASUCA's charge that enforcement presents a "potentially insurmountable obstacle to meaningful price regulation" (NASUCA Comments, at 5), the Workshop Report shows that voluntary industry self-enforcement can be effective in policing OSP overcharging. The Workshop Report illustrates that charging above tariff rates for toll calls is no longer a common occurrence for OSPs providing service from payphones in California. The Workshop Report shows that for each three-month period covered by the report, from the third quarter of 1992 through the third quarter of 1993, the percentage of COPT-originated intrastate toll calls that involved overcharging never exceeded 3.3% of such calls. The average percentage of overcharged toll calls for the entire period covered by the Workshop Report was 2.4%. Overcharging for toll calls from payphones is no longer a problem in California precisely because

an effective system of rate regulation has been instituted that is enforced by the industry and supervised by regulatory staff.

The administrative burdens involved in supervising the enforcement effort in California are slight. CPUC staff involvement in the enforcement program, which includes oversight by a mid-level supervisory staff member, is minimal but provides essential authority for implementing the enforcement effort. CPA, the COPT providers' own industry association, carries the brunt of responsibility for periodic inspection and testing of COPT stations for compliance with a broad range of consumer safeguards, including the CPUC-mandated rate caps. The cost of this enforcement effort is funded through an element of the LECs' monthly line charges for COPT exchange access.

California's LECs also play an active role in enforcing the rate caps on OSP charges from payphones. As part of its obligations under the 1990 COPT settlement, Pacific Bell implemented a scanning and rejection program whereby OSP call records submitted to Pacific for billing are scanned for charges that exceed the rate caps. Any call record that shows a violation of the rate caps is rejected and must be corrected by the OSP prior to resubmission (which may not be practical due to the CPUC-established limit on backbilling of calls). The technology for scanning and rejection by LECs and other billing agents is widely available and provides an efficient means of enforcing rate regulation on a national level.

As for NASUCA's concern that developing an appropriate pricing policy would be too difficult, the Commission can draw from the experience of the thirty-four states that impose rate restrictions, as noted by USLD. USLD Comments, at 16. CPA suggests that the Commission could once again look to the California example for prior experience on this issue.

In California, the CPUC originally (in 1985) set the ceiling rates for COPT-originated toll calls (both 1+ and 0+) at the rates of the dominant carrier (the LEC for intraLATA and AT&T for interLATA) plus a slight premium of ten cents per call. As part of the 1990 settlement decision, the ten-cent premium on intraLATA 0+ calls was replaced by a 25-cent set use fee authorized for both COPT providers and LECs alike. CPUC Decision 90-05-018, at 30, 36 CPUC 2d, at 461.

As the interLATA market has grown more competitive and AT&T has been allowed greater rate flexibility, this system has become problematic, both because AT&T is uncomfortable in the role of "official price leader," and because frequent rate changes impose substantial reprogramming costs on COPT providers and OSPs while placing them at risk of being found out of compliance with the changing rate caps. In a pending draft decision, the CPUC has proposed to limit the obligation of COPT providers and their OSPs to match AT&T's rate reductions to a once-annual adjustment in January of each year. See draft decision released for comment July 20, 1994, in CPUC Investigation 87-11-033, at 332 (Ordering Paragraph 32).

CPA respectfully suggests a modified version of the California formula for application to non-sent-paid calls in the interstate jurisdiction. CPA urges the Commission to develop, through a rulemaking procedure, an appropriate margin to be added to an average of the ceiling rates for the standard categories of non-sent-paid calls as provided for in the currently effective tariffs of the three or four predominant carriers. As envisioned by the pending CPUC decision, the ceiling rates so calculated should only be adjusted on an annual basis, so as to avoid requiring COPT providers and their OSPs to adjust rates to track every fluctuation in any of the predominant carriers' rates.

The CPUC chose its ten-cent premium allowance as a margin that would allow COPT providers a revenue margin that would not cause confusion or exploitation of customers. CPUC Decision 85-11-057, 19 CPUC 2d 218, 264-265 (1985). With respect to interstate calls in what is today a very lightly regulated market, a somewhat greater margin of 25 or 50 cents per call may be appropriate. Whatever the determination, however, it can be a fairly simple judgment call based on the proposals and showings of the diverse interested parties, a far easier matter than the implementation of BPP.

- D. Contrary to the IECs' Claim That BPP Will Enhance Competition, CPA Agrees With Those Parties Who Fear That BPP Will Impair Competition by Eliminating an Entire Class of OSPs.
-

There are two very distinct and opposing views about whether BPP will aid or harm competition. A few large IECs support BPP as a way to increase or improve their competitive position in the operator services market. For example, MCI states:

. . . BPP would finally make possible effective competition in the operator service market segment. Currently AT&T enjoys unwarranted advantage in the operator services market because of the remaining vestiges of its monopoly.

MCI Comments, at 2. In direct opposition to that view, the small and mid-sized OSPs and their allies feel extremely threatened by the proposed implementation of BPP. For a variety of reasons, TCG opines,

the Commission's BPP proposal will have an entirely negative impact on local competitors and on the development of local competition. TCG sees absolutely no benefits to local competitors from BPP.

TCG Comments, at 10; see also Teltrust Comments, at 14; USLD Comments, at 11-15; APCC Comments, at 12-21.

CPA can best explain the discrepancy between the large IECs and the smaller competitors by noting that the competitive position of MCI and Sprint would improve dramatically if BPP allowed them inroads upon both AT&T's and the smaller OSPs' current shares of the interLATA payphone calling market. The smaller companies, in particular, will find it virtually

impossible to compete with the likes of MCI and Sprint for name recognition among end users.

Imposition of BPP would necessarily shift the incidence of competition away from the point of contact between the OSP and the payphone provider to the struggle for the loyalty of the end user. While there may be some attraction to the idea of respecting the end user's choice, it must be recognized that the range of choices available to most end users will be limited to those OSPs able to support a massive, nationwide advertising campaign sufficient to achieve "name recognition" by a sizable fraction of the population. Most OSPs, regardless of whether the quality of their services is high or low and regardless of whether they charge competitive or exorbitant rates, will be unable to compete in the national advertising markets, and so will be driven out of business. Far from enhancing competition, BPP would eliminate the mid-level and small OSPs, leaving a limited oligopoly consisting of a handful of IECs with sufficient resources to conduct massive advertising campaigns. This would be a perverse result of a program intended to enhance competition among providers of operator services.

In stark contrast to BPP, rate cap regulation would eliminate only those unqualified OSPs which either gouge the public intentionally or are so poorly managed that they cannot offer services in an efficient manner. While BPP would drive out of business all OSPs except the handful able to develop nationwide name recognition through massive promotional efforts,


rate cap regulation would reward those OSPs able to compete efficiently and would provide consumers an attractive range of choices among operator service providers.

III. CONCLUSION

The parties universally agree that the main reason for imposing BPP would be to curtail the practice of OSP overcharging. But BPP is an idea whose time has come and gone. Rate regulation is a viable alternative to BPP that could be implemented almost immediately at a fraction of the cost of BPP, is enforceable and is desirable from the perspective of retaining a market niche for the rule-abiding smaller OSPs. CPA therefore respectfully urges the Commission to adopt the recommendations submitted herein. Specifically, CPA urges that the Commission abandon further consideration of BPP and instead pursue the less costly and far more promising alternative of reasonable rate cap regulation.

Respectfully submitted,

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September 14, 1994

CERTIFICATE OF SERVICE

I, E. M. Ellingson, certify that I have this date caused the foregoing **REPLY COMMENTS OF CALIFORNIA PAYPHONE ASSOCIATION** to be sent by Federal Express today to the Federal Communications Commission and will serve on the parties of interest by sending a copy by United States mail, first-class, postage prepaid on September 14, 1994 to all parties on the attached Service List.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 13th day of September 1994, at San Francisco, California.



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